

# EXHIBIT C



Allauna Gluski &lt;allauna@lloydmousilli.com&gt;

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**Fwd: Re: Unauthorized Restrictions on Assets**

1 message

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**William Shibley** <shib27@gmail.com>

Wed, May 8, 2024 at 11:21 PM

Reply-To: shib@stanfordalumni.org

To: allauna@lloydmousilli.com, feras@lloydmousilli.com, Megan Matthees &lt;megan@lloydmousilli.com&gt;, Litigation &lt;Litigation@lloydmousilli.com&gt;

----- Forwarded Message -----

**Subject:**Re: Unauthorized Restrictions on Assets**Date:**Wed, 8 May 2024 23:14:21 -0400**From:**Nico Banks <nico@bankslawoffice.com>**To:**shib@stanfordalumni.org**CC:**richard nerviglaw.com <richard@nerviglaw.com>, Josh Stein <josh.stein.esq@gmail.com>

I'm widely available tomorrow if you want to discuss it further.

Best,

Nico Banks, Esq.

Banks Law Office, P.C.

Pronouns: he/him

Tel.: 971-678-0036

712 H St NE,

Unit #8571,

Washington, DC 20002

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On Wed, May 8, 2024 at 11:12 PM Nico Banks <[nico@bankslawoffice.com](mailto:nico@bankslawoffice.com)> wrote:

William,

If I thought there was any possibility that your client was facing a genuine emergency that warranted the emergency relief you are requesting, I of course would not hesitate to cooperate. But, respectfully, there is no emergency here. Max O. Day has plenty of other assets he can draw from to satisfy his necessary household expenses, up to a maximum of \$9,000 per month. Although your letter does not provide identifying information for the frozen accounts--such as the name of the bank, or the amount of money in the account--I know that Max O. Day controls different accounts at many different institutions, so the fact that one institution froze some accounts completely will not prevent him from satisfying his necessary expenses.

I certainly did not ask banks to take any action beyond the scope of the asset-freeze order. I gave the banks the asset freeze order itself—including the provision for the allowance—and I gave the bank certain other information to help them identify shell companies that are controlled by your clients. The banks then made their own decisions about how to implement the order (and, presumably, they also had to decide how to otherwise comply with applicable AML laws given that the asset freeze raises the possibility of criminal activity). If Max O. Day's daughter truly has a separate account with funds that have never been within Max O. Day's control, that seems like a matter you should probably address with the bank. I can't evaluate whether or not the bank correctly determined that the daughter's account was within the scope of the asset freeze without more information.

By the way, please remember that the tax-return production is due today.

Regards,

Nico Banks, Esq.  
Banks Law Office, P.C.  
Pronouns: he/him  
Tel.: 971-678-0036  
[712 H St NE](#),  
Unit #8571,  
Washington, DC 20002

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On Wed, May 8, 2024 at 9:59 PM William Shibley <[shib27@gmail.com](mailto:shib27@gmail.com)> wrote:

Mr. Banks,

Please review the attached and get back to me.

William Shibley